

AO 91 (Rev. 01/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of New Mexico

United States of America)

v.)

Roberta Yvette ZUNIGA)

Case No: 20mj 734

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of February 27, 2020 in the county of Dona Ana in the State and District of New Mexico, the defendant violated 8 U.S.C. §1324(a)(1)(A)(ii)(Transporting), an offense described as follows:

knowing or in reckless disregard of the fact that Material Witness 1, had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law

This criminal complaint is based on these facts:

On February 27, 2020, Border Patrol Agents (BPA) and Homeland Security Investigations (HSI) Agents received information of undocumented aliens being held at a hotel located in Las Cruces, Dona Ana County, New Mexico. Border Patrol Agents were able to determine Defendant, Roberta Yvette Zuniga, had rented the hotel room. After arriving at the hotel, Border Patrol and HSI Agents knocked on the door of the hotel room making contact with four individuals inside. After being questioned as to their citizenship, two individuals stated they were citizens of Honduras, one individual stated he was from El Salvador, and the other individual stated he was Guatemala.

☒ Continued on the attached sheet.


Complainant's signature

Jesus Diaz, Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: March 1, 2020

City and state: Las Cruces, N.M.


Judge's signature
CARMEN E. GARZA
U.S. MAGISTRATE JUDGE

Printed name and title

CONTINUATION OF CRIMINAL COMPLAINT

STATE AND DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA

V.

Roberta Yvette ZUNIGA

Continuation of Statement of Facts:

All four individuals admitted to being in the United States illegally and did not possess any immigration documents to be or remain in the United States legally.

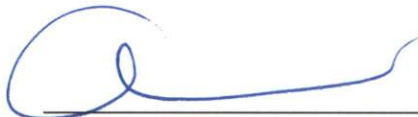
During a post Miranda interview, Material Witness 1 (Mat Wit 1) identified Defendant Roberta Zuniga as the person who picked him up at a gas station located between El Paso, Texas and Las Cruces, New Mexico, and transported him to a hotel in Las Cruces, New Mexico. Mat Wit 1 states Defendant Zuniga already had a key to the hotel room and opened the door for him. Mat Wit 1 states Defendant Zuniga instructed him to be quiet and also stated she is paying for the hotel room. Mat Wit 1 states Defendant Zuniga would deliver food to him and also stated she had arranged the transportation to Dallas, Texas for Mat Wit 1.

During the interview, Agents were able to determine Defendant Roberta Zuniga's residence. Agents from HSI and Border Patrol made contact with Defendant Zuniga at her residence subsequently apprehending her.

During a post Miranda interview, Defendant Roberta Zuniga admitted to renting the hotel room.

Assistant United States Attorney Aaron Jordan was contacted and accepted prosecution of Roberta Zuniga for 8 USC 1324 Transporting Illegal Aliens.

Continuation of Statutory Language:



Signature of Judicial Officer

CARMEN E. GARZA
U.S. MAGISTRATE JUDGE



Signature of Complainant

Diaz, Jesus
Filing Agent